

United States District Court
District of Puerto Rico

United States of America
 Plaintiff
 v.
 Jesus A. Uribe-Londono
 Defendant

Crim. No. 00-0092 (JAF)

Response to United States of America's Motion in Opposition to
Motions for Sanctions

TO THE HONORABLE COURT :

COMES NOW, Jesus A. Uribe-Londono, pro se, and very respectfully states and prays as follows:

In its March 31st, 2008 Motion and Declaration the Government admits that it requested the FBI to destroy defendant's property (See April 1st, 2008 FBI Declaration, Pg. 2), thus disregarding the multiple requests made by the defendant for the return of his property, and before any decision or permission was granted by the District Court, violating the Defendant's right to due process of law, without providing the Court any evidence that such property was related to the case.

Defendant filed in the Courts the following Motions requesting the return of his property: See docket:

- 3/28/03 Motion pro se for Return of Property
- 6/10/03 Reply to Response to Motion for Return of Property
- 9/10/03 Response to Opposition to Reply to Motion for Return of Property
- 2/27/04 Motion for Return of Property / Post Trial
- 1/21/05 Motion for Return of Property / Post Trial, pro se
- 4/22/05 Motion for Reconsideration - Return of Property
- 6/21/05 Notice of Appeal - Return of Property
- 7/18/05 Motion to Stay or Set Aside Final Order of Forfeiture
 Pending Appeal, pro se

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- 5/09/06 Motion for Return of Personal Property, pro se
- 8/14/06 Motion for Reconsideration
- 8/26/06 Notice of Appeal
- 7/20/07 USCA - Reversed and Remanded
- 2/28/08 Informative Motion to the Court about destruction of Personal Property by government.
- 3/14/08 Motion requesting sanctions against government for destruction of property without permission from the Court nor due process.

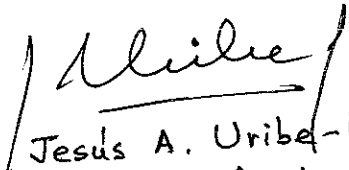
To disregard such a number of repeated requests and ignore the rules of due process of law and proceed by destroying the defendant's property shows a complete disrespect for the defendant's rights and for the Court's ability to decide these issues, confirming that the government has acted in bad faith, vexatiously, wantonly and for oppressive reasons. Moreover, the government continues to send all correspondence in regard to this issue to the wrong address, even though it has been notified of the proper address on any and all Motions that the defendant has sent, causing further delays and anguish in regards to this matter, once again re-enforcing defendant's position that the government knowingly has acted in bad faith. Once more the government confirms its absolute lack of attention and focus when establishing that the property only contained bank records, while in the same document it had admitted that it contained notebooks, business cards, manuscripts, notes, books, natural resources videos, documents and computer files, all of which are of an extra-ordinary importance for the future employment of the defendant, and hinders his ability to re-integrate into society, given that the information destroyed contained the necessary business contacts, analytical tools, models,

and field notes required to continue in his profession as an environmental and natural resources specialist.

As to the value of the destroyed property it represents over twenty years of professional activity, records and technical information which is conservatively estimated in \$250,000. Upon request, a detailed analysis of these costs may be presented to the Court.

WHEREFORE, defendant reaffirms his request from this Honorable Court to grant his Motion for Sanctions against the government and to appoint him a Public Defender to further represent him, if need be.

Respectfully submitted this 9th day of July of 2008

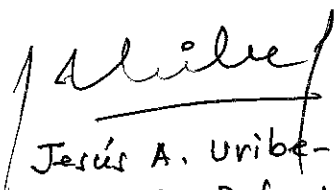

Jesús A. Uribe-Londono
Pro Se Defendant
Reg. No 18870-069 FMC
P.O. Box 879 Ayer, MA 01432

Certificate of Service

I hereby certify that on this date a true and correct copy of the foregoing Motion has been mailed to:

Maritza Gonzalez
Assistant U.S. Attorney
Torre Chardon, Suite 1201
Carlos Chardon Ave #350
Hato Rey, PR 00918

July 9, 2008


Jesús A. Uribe-Londono
Pro-Se Defendant